November 20, 2002

Re: Printpack, Inc. 105-15751-00018

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Independent Packaging
303 N. Curry Pike
Bloomington, Indiana 47404

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 105-10511-00018	Date Issued: April 25, 2000
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	

First Significant Permit Modification No.: T 105-15751-00018	Affected Pages: 2-6, 9, 28-33, and 37, with Pages 30a, 30b, 32a, 32b, and 37a added
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 20, 2002

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary flexographic printing source.

Responsible Official:	Mr. Gary Whiteside
Source Address:	303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address:	303 N. Curry Pike, Bloomington, Indiana 47404
Phone Number:	812 - 339 - 9294
SIC Code:	2759
County Location:	Monroe
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Three (3) flexographic printing presses (#1, #2 and #3), known as EU-001, installed in 1994, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #1, rated at 2.5 million British thermal units per hour, exhausting through Stack 001, capacity: 43.2 million square inches per hour, each.

(b) One (1) flexographic printing press (press #4), known as EU-002, installed in 1997, equipped with a catalytic oxidizer, known as catalytic oxidizer #2, rated at 2.5 million British thermal units per hour, exhausting through Stack 002, capacity: 43.2 million square inches per hour.

(c) One (1) fifty (50) inch, eight (8) color flexographic printing press, (press #5), known as EU-003, installed in 1999, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, rated at 0.9 million British thermal units per hour for control of volatile organic compounds, exhausting through Stack 003, capacity: 43.2 million square inches per hour.

(d) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, exhausting through Stack 004, capacity: 455 pounds of ink and solvent per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Twenty (20) bag folding and cutting machines, PM less than five (5) pounds per hour or twenty-five (25) pounds per day. (326 IAC 6-3-2).

(b) Two (2) 4,000 gallon solvent storage tanks.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;
(2) The compliance status;
(3) Whether compliance was based on continuous or intermittent data;
(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the job title responsible for inspecting, maintaining, and repairing emission control devices;
(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) Three (3) flexographic printing presses (#1, #2 and #3), known as EU-001, installed in 1994, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #1, rated at 2.5 million British thermal units per hour, exhausting through Stack 001, capacity: 43.2 million square inches per hour, each.

(b) One (1) flexographic printing press (press #4), known as EU-002, installed in 1997, equipped with a catalytic oxidizer, known as catalytic oxidizer #2, rated at 2.5 million British thermal units per hour, exhausting through Stack 002, capacity: 43.2 million square inches per hour.

(d) One (1) ink mix room containing one (1) 55-gallon open top mixing vessel with floor sweeps for ventilation, known as EU-004, installed in 1994, exhausting through Stack 004, capacity: 455 pounds of ink and solvent per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic arts operation), the Permittee shall install, operate, and maintain catalytic oxidizers and an associated capture system to capture and control emissions from processes EU-001 (presses #1 - #3) and EU-002 (press #4). Said emission control equipment shall achieve, at a minimum, destruction and overall control efficiencies of 90% and 60%, respectively.

Until the initial compliance stack tests are performed, the Permittee shall maintain the catalytic oxidizers at a minimum operating temperature of 550 degrees Fahrenheit and the associated capture system within a duct pressure range established based on the manufacturer's specifications and recommendations.

After completion of the initial compliance stack test, the Permittee shall maintain the catalytic oxidizers and associated capture system at the minimum operating temperature and duct pressure range determined of the most recent compliance stack test that achieve the minimum destruction and overall control efficiencies required in Part (a) of this Condition.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) The Permittee shall limit the VOC emissions from processes EU-001, EU-002 and EU-004 to less than 250 tons per year, based on a twelve (12) month rolling total.

(b) To achieve compliance with the limit in Part (a) of this Condition and the requirements of Condition D.1.1, the Permittee shall operate and maintain at all times processes EU-001 and EU-002 are in operation, catalytic oxidizers and an associated capture system:

(1) according to the requirements specified in Condition D.1.1; and
(2) at the minimum operating temperature and duct pressure range determined in the most recent compliance stack test that achieves compliance with the VOC emission limit of Part (a) of this condition and the destruction and overall control efficiency requirements of Condition D.1.2.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU-001 and EU-002 (Presses #1 - #4) and their control devices and the EU-004 (mixing room).

Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Volatile Organic Compounds (VOC)

To determine compliance with the VOC limit of Condition D.1.2, the Permittee shall, on a monthly basis:

(a) determine the VOC emissions from processes EU-001, EU-002, and EU-004, utilizing the following equation:

[X * (1 - (CE EU-001 * DE EU-001))] + [Y * (1 - (CE EU-002 * DE EU-002)] + [0.02 * Z] = tons VOC/month

where:

X = VOC input to EU-001 (tons VOC/month),
Y = VOC input to EU-002 (tons VOC/month), and
Z = VOC input to EU-004
CE EU-001 = capture efficiency of EU-001 capture system, as obtained from the most recent acceptable capture test
DE EU-001 = destruction efficiency of EU-001 catalytic oxidizer, as obtained from the most recent acceptable stack test
CE EU-002 = capture efficiency of EU-002 capture system, as obtained from the most recent acceptable capture test
DE EU-002 = destruction efficiency of EU-002 catalytic oxidizer, as obtained from the most recent acceptable stack test

The input VOCs used to determine the monthly emissions shall be derived using formulation data supplied by the coating manufacturer.

The Office of Air Quality (OAQ) reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4;

and

(b) determine the 12 month rolling total VOC emissions utilizing the following equation:

Tons VOC/yr (12 month rolling total) = [(tons VOC past 11 months) + (tons VOC this month)]

D.1.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

(a) During the period between 12 to 30 months after the issuance of this permit or within two and one half (2½) years of the latest valid compliance demonstration, whichever is applicable, the Permittee shall perform compliance stack tests to establish the operating temperature(s) of the catalytic oxidizer(s) that achieve compliance with the destruction and overall control efficiencies required in Condition D.1.1 and the VOC emission limit of Condition D.1.2; and

(b) During the period between 12 to 30 months after the issuance of this permit or within five (5) years of the latest valid compliance demonstration, whichever is applicable, the Permittee shall perform compliance stack tests to establish the duct pressure range(s) of the capture system(s) that achieve compliance with the destruction and overall control efficiencies required in Condition D.1.1 and the VOC emission limit of Condition D.1.2**.**

The stack tests required in Part (a) of this Condition shall be performed at least once every two and one half (2 ½) years after the last valid compliance demonstration utilizing methods approved by the Commissioner.

The stack tests required in Part (b) of this Condition shall be performed at least once five (5) years after the last valid compliance demonstration utilizing methods approved by the Commissioner.

D.1.6 Continuous Monitoring Systems and Emission Control Equipment

To determine compliance with the limits of Conditions D.1.1 and D.1.2, the owner or operator shall:

(a) install, calibrate, maintain, and operate according to the manufacturer's specifications:

(1) a continuous monitoring system (CMS) on the catalytic oxidizers for measuring the operating temperature, and

(2) duct pressure meters and recorders at the duct inlet for measuring the duct pressure of the capture system;

and

(b) develop and implement the following additional inspection, maintenance, and preventive measures other than those required under Condition D.1.3, for the catalytic oxidizers, capture system, temperature CMS, and duct pressure meters and recorders:

(1) monthly inspection, routine maintenance, and if necessary, repair and/or replacement of flexible press hoses and fan motor belts;
(2) quarterly inspection, routine maintenance, and if necessary, repair and/or replacement of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);
(3) monthly inspection, routine maintenance, and if necessary, repair and/or replacement of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
(4) monthly visual inspections, routine maintenance, and if necessary, repair and replacement of rooftop ductwork;
(5) annual flow direction (i.e. "Smoke") tests;
(6) annual calibration of the oxidizer press controller; and
(7) inspection, routine maintenance, and if necessary, repair and/or replacement of the temperature CMS and duct pressure meters and recorders, performed according to the manufacturer's specifications.

These inspection, maintenance, and preventive measures shall be included in the Preventive Maintenance Plan (PMP) required in Condition D.1.3.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Monitoring Requirements

(a) To demonstrate compliance with the control requirements of Conditions D.1.1 and D.1.2, the Permittee shall record:

(1) the catalytic oxidizer operating temperatures required in Condition D.1.6(a)(1);
(2) the duct pressure of the capture system required in Condition D.1.6(a)(2); and
(3) the results of the inspections required in Condition D.1.6(b) including in the record the findings of the inspection and all maintenance actions taken.

(b) To demonstrate compliance with the VOC emission limit of Condition D.1.2, the owner or operator shall record on a monthly basis, the following from processes EU-001, EU-002, and EU-004:

(1) the input VOCs;
(2) the individual VOC emissions in tons per month;
(3) the combined total process VOC emissions in tons per month; and
(4) the 12 month rolling total VOC emissions;

as required in Condition D.1.4.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (a) through (g) below.

(a) the VOC usage from inks, coatings, and press cleaning each day (this information may be retained in the computerized information management system of the plant);

(b) the VOC usage from inks, coatings, and press cleaning each month in tons per month (this information may be retained in the computerized information management system of the plant);

(c) the estimated monthly VOC emissions from processes EU-001, EU-002, and EU-004;

(d) The estimated 12-month rolling total VOC emissions after each month;

(d) A copy of the most recent oxidizer destruction efficiency test report;

(e) A copy of the representative baseline capture efficiency test report; and

(f) records of the parametric monitoring conducted pursuant to the requirements of Condition D.1.7(a)(3).

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(c) One (1) fifty (50) inch, eight (8) color flexographic printing press, (press #5), known as EU-003, installed in 1999, equipped with a natural gas-fired catalytic oxidizer, known as catalytic oxidizer #3, rated at 0.9 million British thermal units per hour for control of volatile organic compounds, exhausting through Stack 003, capacity: 43.2 million square inches per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

Pursuant to 326 IAC 8-5-5 (Graphic arts operation), the Permittee shall install, operate, and maintain catalytic oxidizers and an associated capture system to capture and control emissions from process EU-003 (press #5) Said emission control equipment shall achieve, at a minimum, destruction and overall control efficiencies of 90% and 60%, respectively.

Until the initial compliance stack tests are performed, the Permittee shall maintain the catalytic oxidizer at a minimum operating temperature of 600 degrees Fahrenheit and the associated capture system within a duct pressure range established based on the manufacturer's specifications and recommendations.

After completion of the initial compliance stack test, the Permittee shall maintain the catalytic oxidizer and associated capture system at the minimum operating temperature and duct pressure range determined of the most recent compliance stack test that achieve the minimum destruction and overall control efficiencies required in Part (a) of this Condition.

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) The Permittee shall limit the VOC emissions from process EU-003 to less than 250 tons per year, based on a twelve (12) month rolling total.

(b) To achieve compliance with the limit in Part (a) of this Condition and the requirements of Condition D.2.1, the Permittee shall operate and maintain at all times process EU-003 is in operation, a catalytic oxidizer and an associated capture system:

(1) according to the requirements specified in Condition D.2.1; and

(2) at the minimum operating temperature and duct pressure range determined in the most recent compliance stack test that achieves compliance with the VOC emission limit of Part (a) of this condition and the destruction and overall control efficiency requirements of Condition D.2.2.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU-003 (Press #5) and its control device.

Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Volatile Organic Compounds (VOC)

To determine compliance with the VOC limit of Condition D.2.1, the Permittee shall, on a monthly basis:

(a) determine the VOC emissions from process EU-003, utilizing the following equation:

[X * (1 - (CE EU-003 * DE EU-001))] = tons VOC/month

where:

X = VOC input to EU-003 (tons VOC/month),
CE EU-003 = capture efficiency of EU-003 capture system, as obtained from the most recent acceptable capture test
DE EU-003 = destruction efficiency of EU-003 catalytic oxidizer, as obtained from the most recent acceptable stack test

The input VOCs used to determine the monthly emissions shall be derived using formulation data supplied by the coating manufacturer.

The Office of Air Quality (OAQ) reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4;

and

(b) determine the 12 month rolling total VOC emissions utilizing the following equation:

Tons VOC/yr (12 month rolling total) = [(tons VOC past 11 months) + (tons VOC this month)]

D.2.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

(a) During the period between 12 to 30 months after the issuance of this permit or within two and one half (2½) years of the latest valid compliance demonstration, whichever is applicable, the Permittee shall perform compliance stack tests to establish the operating temperature of the catalytic oxidizer that achieve compliance with the destruction and overall control efficiencies required in Condition D.2.1 and the VOC emission limit of Condition D.2.2; and

(b) During the period between 12 to 30 months after the issuance of this permit or within five (5) years of the latest valid compliance demonstration, whichever is applicable, the Permittee shall perform compliance stack tests to establish the duct pressure range of the capture system that achieve compliance with the destruction and overall control efficiencies required in Condition D.2.1 and the VOC emission limit of Condition D.2.2.

The stack tests required in Part (a) of this Condition shall be performed at least once every two and one half (2 ½) years after the last valid compliance demonstration utilizing methods approved by the Commissioner.

The stack tests required in Part (b) of this Condition shall be performed at least once five (5) years after the last valid compliance demonstration utilizing methods approved by the Commissioner.

D.2.6 Continuous Monitoring Systems and Emission Control Equipment

To determine compliance with the limits of Conditions D.2.1 and D.2.2, the owner or operator shall:

(a) install, calibrate, maintain, and operate according to the manufacturer's specifications:

(1) a continuous monitoring system (CMS) on the catalytic oxidizer for measuring the operating temperature, and

(2) duct pressure meters and recorders at the duct inlet for measuring the duct pressure of the capture system;

and

(b) develop and implement the following additional inspection, maintenance, and preventive measures other than those required under Condition D.2.3, for the catalytic oxidizers, capture system, temperature CMS, and duct pressure meters and recorders:

(1) monthly inspection, routine maintenance, and if necessary, repair and/or replacement of flexible press hoses and fan motor belts;
(2) quarterly inspection, routine maintenance, and if necessary, repair and/or replacement of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);
(3) monthly inspection, routine maintenance, and if necessary, repair and/or replacement of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
(4) monthly visual inspections, routine maintenance, and if necessary, repair and replacement of rooftop ductwork;
(5) annual flow direction (i.e. "Smoke") tests;
(6) annual calibration of the oxidizer press controller; and
(7) inspection, routine maintenance, and if necessary, repair and/or replacement of the temperature CMS and duct pressure meters and recorders, performed according to the manufacturer's specifications.

These inspection, maintenance, and preventive measures shall be included in the Preventive Maintenance Plan (PMP) required in Condition D.2.3.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Monitoring Requirements

(a) To demonstrate compliance with the control requirements of Conditions D.2.1 and D.2.2, the Permittee shall record:

(1) the catalytic oxidizer operating temperatures required in Condition D.2.6(a)(1);
(2) the duct pressure of the capture system required in Condition D.2.6(a)(2); and
(3) the results of the inspections required in Condition D.2.6(b) including in the record the findings of the inspection and all maintenance actions taken.

(b) To demonstrate compliance with the VOC emission limit of Condition D.2.2, the owner or operator shall record on a monthly basis, the following from process EU-003:

(1) the input VOCs;
(2) the individual VOC emissions in tons per month;
(3) the combined total process VOC emissions in tons per month; and
(4) the 12 month rolling total VOC emissions;

as required in Condition D.2.4.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (a) through (g) below.

(a) the VOC usage from inks, coatings, and press cleaning each day (this information may be retained in the computerized information management system of the plant);

(b) the VOC usage from inks, coatings, and press cleaning each month in tons per month (this information may be retained in the computerized information management system of the plant);

(c) The estimated monthly VOC emissions from process EU-003;

(d) The estimated 12-month rolling total VOC emissions after each month;

(e) A copy of the most recent oxidizer destruction efficiency test report;

(f) A copy of the representative baseline capture efficiency test report; and

(g) records of the parametric monitoring conducted pursuant to the requirements of Condition D.2.7(a)(3).

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

Twenty (20) bag folding and cutting machines, PM less than five (5) pounds per hour or twenty-five (25) pounds per day. (326 IAC 6-3-2).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the bag folding and cutting machines shall not exceed allowable PM emission rate based on the following equations:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.2 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Printpack, Inc.
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Part 70 Permit No.: 105-10511-00018
Facility: EU-001 (Presses #1 - #3), EU-002 (Press #4) and EU-004 (Mixing Room)
Parameter: VOC Emissions
Limit: 250 tons VOC/yr

YEAR: _____

Month	(X) Input VOC EU-001 (tons/month)	(Y) Input VOC EU-002 (tons/month)	(Z) Input VOC EU-004 (tons/month)	(1) tons VOC this Month	(2) tons VOC Previous 11 Months	(3) 12 Month Rolling Total

Emission Calculation Methods:

VOC Emissions This Month:

(1) = [X * (1 - (CE EU-001 * DE EU-001))] + [Y * (1 - (CE EU-002 * DE EU-002)] + [0.02 * Z] = tons VOC/month

where:

CE EU-001 = capture efficiency of EU-001 capture system, as obtained from the most recent acceptable capture test
DE EU-001 = destruction efficiency of EU-001 catalytic oxidizer, as obtained from the most recent acceptable stack test
CE EU-002 = capture efficiency of EU-002 capture system, as obtained from the most recent acceptable capture test
DE EU-002 = destruction efficiency of EU-002 catalytic oxidizer, as obtained from the most recent acceptable stack test

Tons VOC From the Previous 11 Months:

(2) = The sum of the values determined for column (1) from the past 11 months.

12 Month Rolling Total:

(3) = (1) + (2)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Printpack, Inc.
Source Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Mailing Address: 303 N. Curry Pike, Bloomington, Indiana 47404
Part 70 Permit No.: 105-10511-00018
Facility: EU-003 (Press #5)
Parameter: VOC Emissions
Limit: 250 tons VOC/yr

YEAR: _____

Month	Input VOC EU-003 (tons/month)	(1) tons VOC this Month	(2) tons VOC Previous 11 Months	(3) 12 Month Rolling Total

Emission Calculation Methods:

VOC Emissions This Month:

(1) = [X * (1 - (CE EU-003 * DE EU-003))] = tons VOC/month

where:

CE EU-003 = capture efficiency of EU-003 capture system, as obtained from the most recent acceptable capture test
DE EU-003 = destruction efficiency of EU-003 catalytic oxidizer, as obtained from the most recent acceptable stack test

Tons VOC From the Previous 11 Months:

(2) = The sum of the values determined for column (1) from the past 11 months.

12 Month Rolling Total:

(3) = (1) + (2)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a
Significant Permit Modification to an Existing Part 70 Permit

Source Name:	Printpack, Inc.
Source Location:	303 North Curry Pike, Bloomington, IN 47404
County:	Monroe
SIC Code:	2759
Operation Permit No.:	105-10511-00018
Operation Permit Issuance Date:	April 25, 2000
Significant Permit Modification No.:	105-15751-00018
Permit Reviewer:	SDF

On June 1, 2002, the Office of Air Quality (OAQ) had a notice published in the Herald Times, located in Bloomington, Indiana, stating that Printpack, Inc. had applied for a construction permit to construct and operate a stationary flexographic printing source. The notice also stated that the OAQ proposed to issue a permit for this proposed modification and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On June 28, 2002, Printpack, Inc. submitted the following comments on the proposed Significant Permit Modification. The summary of the comments and corresponding responses is as follows. All deleted information is struck out and all language added is indicated in bold type.

1. Comment 1:

Some of the wording in Section D of Bloomington's draft First Significant Permit Modification to T105-15751-00018 is inconsistent with the previously negotiated language for Printpack's Greensburg location. Unfortunately, some of the language still propogates periodic capture testing abrogated under previous negotiations. Obviously the State can require testing as deemed necessary, but stipulating regular retesting of capture efficiency was deemed unnecessary and overly costly during the Greensburg negotiations. We have no reason to believe anything has changed in this respect. Printpack again requests that the Bloomington permit language in Section D be modified consistent with the previously agreed to language of the Greensburg permit.

To eliminate all requirements associated with subsequent capture system testing, Printpack, Inc. has submitted the following proposed specific changes. The response to the above comment is addressed by responding to the individual change proposed by Printpack.

Response 1:

(a) Proposed Change 1:

Reference D.1.1, third paragraph: Delete May 29 draft language and insert "After completion of the initial stack test, the Permittee shall maintain the catalytic oxidizers at a minimum operating temperature determined in the most recent compliance stack test to achieve a destruction efficiency of 90 percent or greater.

Further the capture system shall be maintained at the duct pressure range demonstrated in the initial baseline capture test sufficient to document compliance with the overall control efficiency of 60% or greater."

Response to Proposed Change 1:

The third paragraph of Condition D.1.1 is necessary because it establishes the oxidizer and capture system operating parameters that apply after the initial compliance tests are performed which includes a statement that the Permittee shall maintain the catalytic oxidizers and associated capture system at the minimum operating temperature and duct pressure range determined "in the most recent compliance stack test."

These requirements are determined to be correct and appropriate.

Printpack's proposed language change eliminates all requirements associated with requiring periodic capture system testing based on their claim that the Office of Air Quality (OAQ) agreed to waive subsequent capture testing for their Greensburg facility.

Upon review of the issue, it is determined that the OAQ only agreed to change the frequency of capture testing from every 2.5 years to every 5.0 years provided the source agreed to additional compliance monitoring requirements, not eliminate subsequent capture system testing.

Thus, since subsequent capture testing is required and the requirements of Condition D.1.1 are correct and appropriate, no changes shall be made.

(b) Proposed Change 2:

Reference D.1.2(b)(2): Delete May 29 draft language and insert "at the minimum operating temperature as determined in the most recent compliance stack test and duct pressure range determined in the baseline capture test that achieved compliance with the VOC emission limits of Part (a) of this Condition and the destruction and overall control efficiency requirements of Condition D.1.2".

Response to Proposed Change 2:

Part (b)(2) of Condition D.1.2 is necessary because it establishes additional catalytic oxidizer and capture system requirements by requiring the Permittee to operate and maintain the control devices at all times the presses are in operation and to operate the control devices at the operating parameters that achieve compliance with the emission limits of Condition D.1.2 as well as the 326 IAC 8-5-5 requirements of Condition D.1.1. Part (b)(2) includes a statement that the control devices must be operated at the minimum operating temperature and duct pressure range determined "in the most recent compliance stack test."

These requirements are determined to be correct and appropriate.

Printpack's proposed language change eliminates all requirements associated with requiring periodic capture system testing based on their claim that the Office of Air Quality (OAQ) agreed to waive subsequent capture testing for their Greensburg facility.

As previously stated, the Office of Air Quality only agreed to change the testing frequency from every 2.5 years to every 5 years.

Therefore, since subsequent capture testing is required and the requirements of Part (b) of Condition D.1.2 are correct and appropriate, no changes shall be made.

(c) Proposed Change 3:

Reference D.1.4(a): Delete May 29 draft clarifying note for CE EU-001 and insert "CE EU-001 = capture efficiency of EU-001 capture system, as obtained from the most recent acceptable capture test".

Response to Proposed Change 3:

The proposed reference change is determined to be acceptable and will not affect any requirements. Therefore, the change shall be made as proposed.

.....

CE EU-001 = capture efficiency of EU-001 capture system, as obtained from the most recent acceptable ~~stack test~~ **capture test**

(d) Proposed Change 4:

Reference D.1.4(a): Delete May 29 draft language clarifying note for CE EU-002 and insert "CE EU-002 = capture efficiency of EU-002 capture system, as obtained from the most recent acceptable capture test".

Response to Proposed Change 4:

The proposed reference change is determined to be acceptable and will not affect any requirements. Therefore, the change shall be made as proposed.

.....

CE EU-002 = capture efficiency of EU-002 capture system, as obtained from the most recent acceptable ~~stack test~~ **capture test**

Thus, since the language required in the second paragraph of Condition D.1.4 reiterates the language required in the original Condition D.1.4 and the volume weighted average yields an average content that can be combined with the usage determined by Printpack's shop floor MRPII, no changes to the Condition shall be required.

(e) Proposed Change 5:

Reference D.1.5: Delete May 29 draft language and insert.

"(a) During the period between 12 and 30 months after the issuance of this permit, the permittee shall perform a capture test on one representative press in EU-001 as selected by IDEM, OAQ and on EU-002.

(b) During the period between 12 and 30 months after the issuance of this permit, compliance stack tests shall be performed on catalytic oxidizers, #1 and #2 to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency thereby complying with 326 IAC 8-5-5. Thereafter, both catalytic oxidizers shall be tested every two and one-half (2.5) years (plus/minus 60 days)."

Response to Proposed Change 5:

Printpack's proposed language change eliminates all requirements associated with requiring periodic capture system testing based on their claim that the Office of Air Quality (OAQ) agreed to waive subsequent capture testing for their Greensburg facility.

As previously stated, the Office of Air Quality only agreed to change the testing frequency from every 2.5 years to every 5 years.

Thus, capture system testing shall still be required every five years.

Printpack has also requested that only one representative oxidizer be tested each time testing is required.

Condition D.1.5 includes the statement "utilizing methods approved by the Commissioner". This statement gives the Compliance Section the authority to approve representative testing if deemed acceptable.

Thus, no changes need to be made to the permit to take into consideration, representative testing.

However, as written, the stack tests associated with the oxidizers and capture systems are required every 2.5 years. This is incorrect.

Compliance with the limits associated with the oxidizers is correct in that subsequent tests are required every 2.5 years. Compliance with the limits associated with the capture systems, however, should be every five years, not every 2.5 years.

Therefore, Condition D.1.5 shall be amended as follows to reflect five year capture system testing.

D.1.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

(a) During the period between 12 to 30 months after the issuance of this permit or within two and one half (2½) years of the latest valid compliance demonstration, **whichever is applicable,** the Permittee shall perform compliance stack tests to establish the operating temperature**(**s**)** of the catalytic oxidizer**(**s**)** that achieve compliance with the destruction and overall control efficiencies required in Condition D.1.1 and the VOC emission limit of Condition D.1.2**; and**

(b) During the period between 12 to 30 months after the issuance of this permit or within five (5) years of the latest valid compliance demonstration, whichever is applicable, the Permittee shall perform compliance stack tests to establish the duct pressure range**(s)** of the capture system**(s)** that achieve compliance with the destruction and overall control efficiencies required in Condition D.1.1 and the VOC emission limit of Condition D.1.2**.**

The~~se~~ stack tests **required in Part (a) of this Condition** shall be performed at least once every two and one half (2 ½) years after the last valid compliance demonstration **utilizing methods approved by the Commissioner.**

The stack tests required in Part (b) of this Condition shall be performed at least once five (5) years after the last valid compliance demonstration utilizing methods approved by the Commissioner.

(f) Proposed Change 6:

Reference D.2.1, third paragraph: Delete May 29 draft language and insert “After completion of the initial stack test, the permittee shall maintain the catalytic oxidizers at a minimum operating temperature determined in the most recent compliance stack test to achieve a minimum destruction efficiency of 90 percent or greater. Further the capture system shall be maintained at the duct pressure range demonstrated in the initial baseline capture test sufficient to document compliance with the overall control efficiency of 60% or greater.”

Response to Proposed Change 6:

The third paragraph of Condition D.2.1 is necessary because it establishes the oxidizer and capture system operating parameters that apply after the initial compliance tests are performed which includes a statement that the Permittee shall maintain the catalytic oxidizers and associated capture system at the minimum operating temperature and duct pressure range determined “in the most recent compliance stack test.“

These requirements are determined to be correct and appropriate.

Printpack’s proposed language change eliminates all requirements associated with requiring periodic capture system testing based on their claim that the Office of Air Quality (OAQ) agreed to waive subsequent capture testing for their Greensburg facility.

Upon review of the issue, it is determined that the OAQ only agreed to change the frequency of capture testing from every 2.5 years to every 5.0 years provided the source agreed to additional compliance monitoring requirements, not eliminate subsequent capture system testing.

Thus, since subsequent capture testing is required and the requirements of Condition D.2.1 are correct and appropriate, no changes shall be made.

(g) Proposed Change 7:

Reference D.2.2(b)(2): Delete May 29 draft language and insert “at the minimum operating temperature as determined in the most recent compliance stack test and duct pressure range determined in the baseline capture test that achieved compliance with the VOC emission limits of Part (a) of this Condition and the destruction and overall control efficiency requirements of Condition D.2.2".

Response to Proposed Change 7:

Part (b)(2) of Condition D.2.2 is necessary because it establishes additional catalytic oxidizer and capture system requirements by requiring the Permittee to operate and maintain the control devices at all times the presses are in operation and to operate the control devices at the operating parameters that achieve compliance with the emission limits of Condition D.2.2 as well as the 326 IAC 8-5-5 requirements of Condition D.2.1. Part (b)(2) includes a statement that the control devices must be operated at the minimum operating temperature and duct pressure range determined “in the most recent compliance stack test.”

These requirements are determined to be correct and appropriate.

Printpack's proposed language change eliminates all requirements associated with requiring periodic capture system testing based on their claim that the Office of Air Quality (OAQ) agreed to waive subsequent capture testing for their Greensburg facility.

As previously stated, the Office of Air Quality only agreed to change the testing frequency from every 2.5 years to every 5 years.

Therefore, since subsequent capture testing is required and the requirements of Part (b) of Condition D.2.2 are correct and appropriate, no changes shall be made.

(h) Proposed Change 8:

Reference D.2.4(a): Delete May 29 draft language clarifying note for CE EU-003 and insert "CE EU-003 = capture efficiency of EU-003 capture system, as obtained from the most recent acceptable capture test."

Response to Proposed Change 8:

The proposed reference change is determined to be acceptable and will not affect any requirements. Therefore, the change shall be made as proposed.

.....

CE EU-003 = capture efficiency of EU-003 capture system, as obtained from the most recent acceptable ~~stack test~~ **capture test**

(i) Proposed Change 9:

Reference D.2.5: Delete May 29 draft language and insert.

"(a) During the period between 12 and 30 months after the issuance of this permit, the permittee shall perform a capture test on EU-003.

(b) During the period between 12 and 30 months after the issuance of this permit, a compliance stack test shall be performed on catalytic oxidizer #3, to determine the minimum operating temperature that will achieve a 90% or greater destruction efficiency thereby complying with 326 IAC 8-5-5. Thereafter, both catalytic oxidizers shall be tested every two and one-half (2.5) years (plus/minus 60 days)."

Response to Proposed Change 9:

Printpack's proposed language change eliminates all requirements associated with requiring periodic capture system testing based on their claim that the Office of Air Quality (OAQ) agreed to waive subsequent capture testing for their Greensburg facility.

As previously stated, the Office of Air Quality only agreed to change the testing frequency from every 2.5 years to every 5 years.

Thus, capture system testing shall still be required every five years.

However, as written, the stack tests associated with the oxidizers and capture systems are required every 2.5 years. This is incorrect.

Compliance with the limits associated with the oxidizers is correct in that subsequent tests are required every 2.5 years. Compliance with the limits associated with the capture systems, however, should be every five years, not every 2.5 years.

Therefore, Condition D.2.5 shall be amended as follows to reflect five year capture system testing.

D.2.5 Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

(a) During the period between 12 to 30 months after the issuance of this permit or within two and one half (2½) years of the latest valid compliance demonstration, the Permittee shall perform compliance stack tests to establish the operating temperature of the catalytic oxidizer that achieve compliance with the destruction and overall control efficiencies required in Condition D.2.1 and the VOC emission limit of Condition D.2.2**; and**

(b) During the period between 12 to 30 months after the issuance of this permit or within five (5) years of the latest valid compliance demonstration, the Permittee shall perform compliance stack tests to establish the duct pressure range of the capture system that achieve compliance with the destruction and overall control efficiencies required in Condition D.2.1 and the VOC emission limit of Condition D.2.2**.**

The~~se~~ stack tests **required in Part (a) of this Condition** shall be performed at least once every two and one half (2 ½) years after the last valid compliance demonstration **utilizing methods approved by the Commissioner.**

The stack tests required in Part (b) of this Condition shall be performed at least once five (5) years after the last valid compliance demonstration utilizing methods approved by the Commissioner.

(j) Proposed Change 10:

Reference pages 37 and 38, Quarterly Report Form: The "source referenced on these forms incorrectly lists "Independent Packaging." Additionally, the "Emission Claculation Methods:" also includes language for CE EU-001, CE EU-002, and CE EU-003 that Printpack requested to be changed above.

Response to Proposed Change 10:

The report forms of Pages 37 and 38 shall be amended as follows, as requested.

(1) Page 37, Report Form:

.....

Source Name: ~~Independent Packaging~~ **Printpack, Inc.**

.....

where:

CE EU-001	=	capture efficiency of EU-001 capture system, as obtained from the most recent acceptable **capture** ~~stack~~ test
DE EU-001	=	destruction efficiency of EU-001 catalytic oxidizer, as obtained from the most recent acceptable stack test
CE EU-002	=	capture efficiency of EU-002 capture system, as obtained from the most recent acceptable **capture** ~~stack~~ test

DE EU-002 = destruction efficiency of EU-002 catalytic oxidizer, as obtained from the most recent acceptable stack test

(2) Page 38, Report Form:

.....

Source Name: ~~Independent Packaging~~ **Printpack, Inc.**

.....

where:

CE EU-003 = capture efficiency of EU-003 capture system, as obtained from the most recent acceptable ~~stack~~ **capture** test

2. Comment 2:

Reference D.1.4(a), second paragraph and D.2.4(a): Delete everything in the second line after the word "manufacturer". Printpack is currently installing its corporate-wide information management system (shop floor MRPII) at Bloomington to track wet material use on each press. This system tracks inks and solvent use by formulation. Each material is disaggregated into its various components using Chemical Abstract Service numbers. This approach allows Printpack to very accurately track Hazardous Air Pollutants (HAPs) as well as volatile organic compounds. Material is tracked through the system by mass (lbs), not volume.

Response 2:

The language after the word "manufacturer" in Paragraph 2 of Conditions D.1.4(a) and D.2.4(a) states that the owner or operator shall use determine the VOC emissions based on a volume weighted average as described in 326 IAC 8-1-2(a)(7). This is incorrect. The emissions should not be determined on a volume weighted basis.

Therefore, Conditions D.1.4 and D.2.4 shall be changed as follows:

D.1.4 Volatile Organic Compounds (VOC)

To determine compliance with the VOC limit of Condition D.1.2, the Permittee shall, on a monthly basis:

(a) .....

The input VOCs used to determine the monthly emissions shall be derived using formulation data supplied by the coating manufacturer ~~and shall be based on a volume weighted average basis as described in 326 IAC 8-1-2(a)(7)~~.

D.2.4 Volatile Organic Compounds (VOC)

To determine compliance with the VOC limit of Condition D.2.1, the Permittee shall, on a monthly basis:

(a) .....

The input VOCs used to determine the monthly emissions shall be derived using formulation data supplied by the coating manufacturer ~~and shall be based on a volume weighted average basis as described in 326 IAC 8-1-2(a)(7)~~.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Significant Permit Modification to an Existing Part 70 Permit

Source Background and Description

Source Name:	Printpack, Inc.
Source Location:	303 North Curry Pike, Bloomington, IN 47404
County:	Monroe
SIC Code:	2759
Operation Permit No.:	105-10511-00018
Operation Permit Issuance Date:	April 25, 2000
Significant Permit Modification No.:	105-15751-00018
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed a permit application from Printpack, Inc. relating to their request to revise inaccurate information in their existing Part 70 permit, modify existing language, and amend requirements in Section D of their existing permit to coincide with similar language found in their Greensburg Part 70 permit.

The proposed modifications will not affect the source emissions or existing applicable requirements and does not trigger any new applicable rules.

The proposed permit modification shall be incorporated into the existing Part 70 via a Significant Permit Modification pursuant to 326 IAC 2-7-12(d)(1) which states that every relaxation of reporting or record keeping permit terms or conditions shall be considered significant.

Existing Approvals

Printpack, Inc. received their Part 70 permit (105-10511-00018) on April 25, 2000. The source has been operating under this permit and the following subsequent approvals:

(1)	105-11179-00018	First Significant Source Modification	Date Issued:	11-5-99
(2)	105-14579-00018	First Administrative Amendment	Date Issued:	8-21-01

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that this Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

Requested Changes

Request 1:

Page 5 of 38,Section A.1: Jack Culver does not work for Printpack, Inc. The "Responsible Official" pursuant to this permit is Mr. Gary Whiteside.

Response 1:

Condition A.1 of Section A shall be amended to reflect Gary Whiteside as the responsible official.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
The Permittee owns and operates a stationary flexographic printing source.

Responsible Official: ~~Jack Culver~~ **Mr. Gary Whiteside**

Request 2:

Page 6 of 38, Section A.3: The number of "insignificant" bag machines is 20, not 18.

Response 2:

Condition A.3 of Section A shall be amended to reflect 20 bag machines instead of 18.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

~~Eighteen (18)~~ **Twenty (20)** bag folding and cutting machines, PM less than five (5) pounds per hour or twenty-five (25) pounds per day. (326 IAC 6-3-2).

In addition, the description of Section D.3 shall be amended to reflect 20 bag folding machines instead of 18.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities
~~Eighteen~~ **Twenty** (~~18~~**20**) bag folding and cutting machines, PM less than five (5) pounds per hour or twenty-five (25) pounds per day. (326 IAC 6-3-2).
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Request 3:

Page 6 of 38, Section A.3: Please note that the plant's two 4,000 gallon solvent storage tanks are not identified in the permit.

Response 3:

Condition A.3 lists the insignificant activities for which there are specific requirements that apply to them.

The storage tanks shall be included in the permit.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Twenty (20) bag folding and cutting machines, PM less than five (5) pounds per hour or twenty-five (25) pounds per day. (326 IAC 6-3-2).

(b) Two (2) 4,000 gallon solvent storage tanks.

Request 4:

Page 9 of 38, Section B.12 (a)(1): Printpack, Inc. requests that this condition be changed to read... "Identification of the job title responsible for inspecting, maintaining, and repairing emission control devices." because high turnover requires constant revisions of the Preventive Maintenance Plan (PMP)."

Response 4:

The purpose of Part (a)(1) of Condition B.12 is to require the owner or operator to make sure that someone is assigned the responsibility of implementing the PMP.

Listing the job title is determined to be an acceptable alternative to the requirement of listing the "individuals" because requiring the job title will still require someone to be responsible for implementing the PMP.

Thus, Part (a)(1) of Condition B.12 shall be amended as follows to reflect the job title as proposed by Printpack, Inc.

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the ~~individual(s)~~ **job title** responsible for inspecting, maintaining, and repairing emission control devices;.....

Request 5:

Page 19 of 38, Section C.1: Printpack, Inc. is not sure what was the original basis of this particulate limit. While flexible film coverting operations do not have processes that inherently emit particulate (dust and aerosols), the permitted limit is inconsistent with the historical volume of material processed at the plant. The limit is based on a process weight rate of 100 pounds or less per hour. Printpack assumes that the "process weight rate" includes the weight of the film that is printed plus the ink and solvent used. If this interpretation is correct, the process weight rate of 100 pounds per hour is an artificially low number that is inconsistent with historical process rates.

Response 5:

Condition C.1 requires all PM emitting processes with a process weight rate less than 100 pounds per hour to not have PM emissions greater than 0.551 lb/hr.

Condition C.1 was included in the permit to account for any insignificant activities, subject to the requirements of 326 IAC 6-3, that may be added in the future.

Thus, the condition shall remain in the permit.

Request 6:

Printpack, Inc. has proposed the following changes to the language of Section D.1 to allow more flexibility.

Response 6:

With various modifications made, the proposed alternative language is determined to be acceptable. The conditions of Section D.1 are amended as follows:

Condition D.1.1 shall be amended to reflect the duct pressure range as the means of demonstrating compliance with the capture efficiency requirements.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

~~(a)~~ Pursuant to 326 IAC 8-5-5 (Graphic arts operation), ~~the catalytic oxidizers shall operate at all times that~~ **the Permittee shall install, operate, and maintain catalytic oxidizers and an associated capture system to capture and control emissions from processes** EU-001 (presses #1 - #3) and EU-002 (press #4) **that achieve, at a minimum, destruction and overall control efficiencies of 90% and 60%, respectively.** ~~are in operation. When operating, the catalytic oxidizers shall maintain a minimum operating temperature of 550 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum ninety percent (90%) destruction of the volatile organic compound (VOC) captured.~~

~~(b) When operating the catalytic oxidizers to achieve the limit for rule 326 IAC 8-5-5(e)(3), a capture system must be used at all times in conjunction with the oxidizers to attain an efficiency sufficient to achieve an overall control efficiency (capture and destruction) of sixty (60%) percent for the flexographic printing presses #1 - #4. The overall destruction efficiency and the use of the catalytic oxidizers are required by the rule 326 IAC 8-5-5.~~

Until the initial compliance stack tests are performed, the Permittee shall maintain the ~~When operating, the~~ catalytic oxidizers ~~shall maintain~~ **at** a minimum operating temperature of 550 degrees Fahrenheit **and the associated capture system within a duct pressure range established based on the manufacturer's specifications and recommendations.** ~~or a~~

After completion of the initial compliance stack test, the Permittee shall maintain the catalytic oxidizers and associated capture system at the minimum operating temperature and duct pressure range determined of the most recent compliance stack test that achieve the minimum destruction and overall control efficiencies required in Part (a) of this Condition.

Condition D.1.2 shall be amended as follows to correct some of the current requirements and to reflect Printpack's proposed changes.

Part (a) of Condition D.1.2 limits the VOC emissions to less than 250 tons per year to avoid the requirements of Prevention of Significant Deterioration (PSD)

Part (b) provides the means by which compliance with the 250 ton annual limit shall be determined.

The overall control efficiencies of Parts (b)(1) and (b)(2) of Condition D.1.2 are the overall control efficiencies established to achieve compliance with the VOC limit of 250 tons per year. While these efficiencies are used to determine the VOC emissions that demonstrate compliance with the 250 tons/yr limit, there is no requirement in the permit to achieve these control efficiencies.

Thus, to provide some flexibility in the overall control efficiencies required, Condition D.1.2 shall be amended to require the source to achieve the destruction and overall efficiencies that achieve compliance with conditions D.1.1 and D.1.2, and language shall be added requiring a VOC "emission" limit, and that the VOC emissions be achieved based on a 12 month rolling total.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

(a) **The Permittee shall limit the VOC emissions from processes** EU-001, EU-002 and EU-004 ~~shall emit~~ **to** less than 250 tons ~~of VOC~~ **per year**, ~~from coatings, dilution solvents, and cleaning solvents,~~ ~~per~~ **based on a** twelve (12) ~~consecutive~~ month ~~period~~ **rolling total** ~~as calculated in Condition D.1.2(b). This input limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.~~

(b) **To achieve compliance with the limit in Part (a) of this Condition and the requirements of Condition D.1.1, the Permittee shall** operate and maintain at all times processes EU-001 and EU-002 are in operation, catalytic oxidizers and an associated capture system:

(1) according to the requirements specified in Condition D.1.1; and

(2) **at the minimum operating temperature and duct pressure range determined in the most recent compliance stack test that achieves compliance with the VOC emission limit of Part (a) of this condition and the destruction and overall control efficiency requirements of Condition D.1.1.**

~~The input of VOC including cleanup solvents to EU-001 (presses #1 - #3), EU-002 (press #4) and EU-004 (mixing room) based on:~~

~~(1) An overall VOC control efficiency of sixty-seven and nine tenths (67.9%) percent for EU-001 or that determined by the latest valid compliance demonstration,~~

~~(2) An overall VOC control efficiency of seventy and five tenths (70.5%) percent for EU-002 or that determined by the latest valid compliance demonstration, and~~

~~(3) A VOC emission factor of two (2%) percent for mixing losses of the input delivered to the EU-004 or that determined by the latest valid compliance demonstration.~~

~~shall be limited by the following equation:~~

~~X * (1 - 0.679) + Y * (1 - 0.705) + 0.02 * Z < 250.0 tons of VOC per twelve (12) consecutive month period.~~
~~where X = VOC input to EU-001,~~
~~Y = VOC input to EU-002, and.~~
~~Z = VOC input to EU-004.~~

~~(c) The requirement from the Amendment to CP 105-3447-00018, issued on June 17, 1994, Condition 8 that required the total amount of VOC as contained in the ink and solvent blend, input to the printing presses (#1 - 3) shall not exceed 197.2 tons per 365-day period, rolled on a daily basis is no longer required since the source has agreed to limit the VOC emissions after controls from presses #1 - 4 and the mixing room to less than 250 tons per twelve (12) consecutive month period in order to avoid the applicability of 326 IAC 2-2~~

Condition D.1.3 consists of the requirements to have a Preventive Maintenance Plan. No changes to this condition are necessary as a result of the Printpack's proposed changes.

Condition D.1.4 lists the compliance determination requirements for Condition D.1.2. The compliance determination equations listed in existing Condition D.1.2 shall be incorporated into this condition.

Printpack, Inc. has requested that the overall control efficiencies associated with the PSD limit be removed from the equation in lieu of a variable overall control efficiency. This request can be granted provided the source utilizes the destruction and overall efficiencies of the most recent compliance stack tests that demonstrate compliance with the requirements of Conditions D.1.1 and D.1.2. Thus, Condition D.1.4 shall be amended as follows.

D.1.4 Volatile Organic Compounds (VOC)

To determine compliance with the VOC ~~usage~~ limit~~ations contained in~~ **of** Condition D.1.2**, the Permittee** shall**, on a monthly basis:** ~~be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer.~~

(a) determine the VOC emissions from processes EU-001, EU-002, and EU-004, utilizing the following equation:

[X * (1 - (CE EU-001 * DE EU-001))] + [Y * (1 - (CE EU-002 * DE EU-002)] + [0.02 * Z] = tons VOC/month

where:

X = VOC input to EU-001 (tons VOC/month),
Y = VOC input to EU-002 (tons VOC/month), and
Z = VOC input to EU-004
CE EU-001 = capture efficiency of EU-001 capture system, as obtained from the most recent acceptable stack test
DE EU-001 = destruction efficiency of EU-001 catalytic oxidizer, as obtained from the most recent acceptable stack test
CE EU-002 = capture efficiency of EU-002 capture system, as obtained from the most recent acceptable stack test
DE EU-002 = destruction efficiency of EU-002 catalytic oxidizer, as obtained from the most recent acceptable stack test

The input VOCs used to determine the monthly emissions shall be derived using formulation data supplied by the coating manufacturer and shall be based on a volume weighted average basis as described in 326 IAC 8-1-2(a)(7).

The ~~IDEM, OAM~~ **Office of Air Quality (OAQ)** reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4**;**

and

(b) determine the 12 month rolling total VOC emissions utilizing the following equation:

Tons VOC/yr (12 month rolling total) = [(tons VOC past 11 months) + (tons VOC this month)] / 12

Condition D.1.5 requires the Permittee to maintain the catalytic oxidizers at 550 degrees or the minimum operating temperature determined in the latest stack test that will achieve at least 60% overall efficiency. These requirements are already listed in Condition D.1.1. Thus, this condition shall be removed.

~~D.1.5 Minimum Temperature Requirement For Catalytic Oxidizer~~

~~When operating, the catalytic oxidizers, known as catalytic oxidizer #1 and #2, shall maintain a minimum temperature of 550 degrees Fahrenheit or the minimum operating temperature determined by the latest stack test that will achieve at least a sixty (60%) percent overall efficiency for each oxidizer.~~

Condition D.1.6 (now Condition D.1.5) lists the testing requirements. Printpack, Inc. has requested this condition be changed as follows, to require testing of both catalytic oxidizers utilizing one representative press.

(a) On and after October 31, 2002, the Permittee shall perform one capture test on either Press #1, Press #2, r Press #3, as selected by IDEM. On or before October 31, 2002, the permittee shall perform a capture test on Press 4.

(b) Compliance stack tests shall be performed for both of the catalytic oxidizers #1 and #2, used to achieve compliance with 326 IAC 8-5-5. The initial stack tests shall be performed on both oxidizers on or before October 31, 2002, and thereafter, both catalytic oxidizers shall be tested every two and one half years (plus/minus 60 days) to determine the minimum operating temperature that will achieve 90% or greater efficiency for these catalytic oxidizers #1 and #2.

The existing stack testing requirement includes the statement “utilizing methods approved by the Commissioner”. This statement is included in the permit to provide the compliance section the ability to establish the test dates and protocols. Thus, the proposed changes do not need to be made. However, Condition D.1.6 (now Condition D.1.5) shall be amended to reflect the changes in the permit language that require the Permittee to achieve the overall control efficiencies that are used to achieve compliance with the PSD limit of Condition D.1.2.

D.1.~~6~~**5** Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

During the period between 12 to 30 months after the issuance of this permit or within two and one half (2½) years of the latest valid compliance demonstration, the Permittee shall perform compliance stack tests ~~for capture and destruction~~ **to establish the operating temperatures of** ~~for~~ the **EU-001 and EU-002** catalytic oxidizers ~~#1 and #2~~ **and the duct pressure range of the capture system that achieve compliance with the destruction and overall control efficiencies required in Condition D.1.1 and the VOC emission limit of Condition D.1.2.** ~~used to achieve compliance with 326 IAC 8-5-5 utilizing methods approved by the commissioner.~~

These stack tests shall be performed at least once every two and one half (2 ½) years after the last valid compliance demonstration **utilizing methods approved by the Commissioner** ~~to determine the minimum operating temperature that will achieve at least a sixty (60%) overall efficiency for each of these oxidizers~~. ~~In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facilities are in compliance.~~

Condition D.1.7 (now Condition D.1.6) currently requires a continuous monitoring system to measure the operating temperature of the catalytic oxidizers and a requirement to include in the PMP, the procedures for trouble shooting, maintenance, and corrective actions when there is a problem.

Printpack, Inc. has proposed the following language for Condition D.1.7 (now Condition D.1.6). Based on review of the language, Condition D.1.7 (now Condition D.1.6) shall be amended as follows. The first paragraph lists the original condition language. This language has been struck out. All language following the first paragraph is the language proposed by Printpack, Inc. Language added by the OAQ is in bold type. Any language deleted by the OAQ is struck out:

D.1.~~7~~**6** Parametric Monitoring

~~A continuous monitoring system shall be calibrated, maintained, and operated on each catalytic oxidizer #1 and #2 for measuring operating temperature. The output of these systems shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack tests for each catalytic oxidizer. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.~~

To determine compliance with the limits of Conditions D.1.1 and D.1.2, the owner or operator shall:

(a) **install,** ~~A continuous monitoring system shall be~~ calibrate~~d~~, maintain~~ed~~, and operate~~ed, ~~**according to the manufacturer's specifications:**

(1) a continuous monitoring system (CMS) on the catalytic oxidizers for measuring **the** operating temperature**, and** ~~The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during he most recent compliance stack test. The Preventive Maintenance Plan (PMP) for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above-mentioned temperature for any one reading.~~

(~~b~~**2**) ~~The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation when the printing presses are operated.~~ **duct pressure meters and recorders at the duct inlet for measuring the duct pressure of the capture system;**

and

~~(c) To assure that exhaust fumes are captured at a rate equivalent or greater than the rate documented during the test program described in Condition D.1.6(a), the oxidizer system pressure controller set point shall be the same as during the baseline test program. The duct operating pressure range around that set point shall be determined during the baseline test program. Meters and recorders shall be installed and operated on or before October 1, 2002 to document compliance with this condition. Any three-hour average pressure reading more than 10% below the bound of the pressure range established during the compliance test shall be an excursion of this condition and shall necessitate implementation of a corrective action plan.~~

(b) **develop and implement the following** additional inspection**, maintenance,** and preventive measures **other than those required under Condition D.1.3, for the catalytic oxidizers, capture system, temperature CMS, and duct pressure meters and recorders:**

(1) monthly inspection**, routine maintenance,** and **if necessary,** repair **and/or replacement** ~~, as necessary~~ of flexible press hoses and fan motor belts;
(2) quarterly inspection, **routine maintenance,** and **if necessary,** repair **and/or replacement**~~, as necessary,~~ of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);

(3) monthly **inspection,~~s~~ routine maintenance, and if necessary, repair and/or replacement** of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
(4) monthly visual inspections**, routine maintenance, and if necessary, repair and replacement** of rooftop ductwork;
(5) annual flow direction (i.e. "Smoke") tests;
(6) annual calibration of the oxidizer press controller; and
(7) **inspection, routine maintenance, and if necessary, repair and/or replacement of the temperature CMS and duct pressure meters and recorders, performed according to the manufacturer's specifications.** ~~Implementation of an operational procedure checklist, including response procedures for deviations from the established duct operating pressure range.~~

These inspection, maintenance, and preventive measures shall be ~~performed as prescribed~~ **included** in the Preventive Maintenance Plan (PMP) **required in Condition D.1.3.** ~~At a minimum, the plan shall include:~~

Since this condition consists of determination requirements, the condition shall become part of the compliance determination section.

A new Condition D.1.7 shall be added to include the monitoring requirements associated with Condition D.1.6.

D.1.7 Monitoring Requirements

(a) To demonstrate compliance with the control requirements of Conditions D.1.1 and D.1.2, the Permittee shall record:

(1) the catalytic oxidizer operating temperatures required in Condition D.1.6(a)(1);

(2) the duct pressure of the capture system required in Condition D.1.6(a)(2); and

(3) the results of the inspections required in Condition D.1.6(b) including in the record the findings of the inspection and all maintenance actions taken.

(b) To demonstrate compliance with the VOC emission limit of Condition D.1.2, the owner or operator shall record on a monthly basis, the following from processes EU-001, EU-002, and EU-004:

(1) the input VOCs;

(2) the individual VOC emissions in tons per month;

(3) the combined total process VOC emissions in tons per month; and
(4) the 12 month rolling total VOC emissions;

as required in Condition D.1.4.

The record keeping requirements of Condition D.1.8 shall be amended as follows to reflect the language proposed by both the Office of Air Quality (OAQ) and Printpack Inc.
The first paragraph and Numbers (1) through (5) list the original condition language. This language has been struck out. All language following the first paragraph is the language proposed by Printpack, Inc. Language added by the OAQ is in bold type. Any language deleted by the OAQ is struck out:

D.1.8 Record Keeping Requirements

~~To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2.~~

~~(1) The VOC content of the inks used for each month;~~

~~(2) The cleanup solvent usage for each month;~~

~~(3) The total VOC usage for each month;~~

~~(4) The weight of VOCs emitted for each compliance period ,and~~

~~(5) The continuous temperature records for the catalytic oxidizers and the temperatures used to demonstrate compliance during the most recent compliance stack test.~~

To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (a) through (g) below. ~~Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.1.1 and D.1.2:~~

(a) ~~Pounds of~~ **the** VOC usage from inks, coatings, and press cleaning each day (this information may be retained in the computerized information management system of the plant);

(b) ~~Pounds of~~ the VOC usage from inks, coatings, and press cleaning each month **in tons per month** (this information may be retained in the computerized information management system of the plant);

(c) The ~~calculated weight of~~ **estimated monthly** VOC~~s~~ **emissions**~~tted~~ **from processes EU-001, EU-002, and EU-004;** ~~for each month as determined by the equation: (VOC usage) * (1 - (capture efficiency * destruction efficiency));~~

(d) The ~~calculated~~ **estimated** 12-month rolling **total** ~~sum of~~ VOC emissions ~~for~~ **after** each month;

(d) A copy of the most recent oxidizer destruction efficiency test report;

(e) A copy of the representative baseline capture efficiency test report; and

(f) **records of the** parametric monitoring **conducted** ~~records required under~~ **pursuant to the requirements of Condition** ~~Section~~ D.1.7**(a)(3)**.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Printpack, Inc. has proposed the following changes to Condition D.1.9.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition**s D.1.1 and** D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Upon review of the proposed changes and the conditions of the existing permit, it is determined that the proposed changes are acceptable. Therefore, Condition D.1.9 shall be changed as proposed.

Request 7:

Printpack, Inc. has proposed the following changes to the language of Section D.1 to allow more flexibility.

Response 7:

With various modifications made, the proposed alternative language is determined to be acceptable. The conditions of Section D.2 are amended as follows:

Condition D.2.1 shall be amended to reflect the duct pressure range as the means of demonstrating compliance with the capture efficiency requirements.

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

~~(a)~~ Pursuant to 326 IAC 8-5-5 (Graphic arts operation), ~~the catalytic oxidizers shall operate at all times that~~ **the Permittee shall install, operate, and maintain a catalytic oxidizer and an associated capture system to capture and control emissions from process** EU-003 (press #5 **that achieves, at a minimum, destruction and overall control efficiencies of 90% and 60%, respectively.** ~~is in operation. When operating, the catalytic oxidizer shall maintain a minimum operating temperature of 600 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined in a stack test to maintain a minimum ninety percent (90%) destruction of the volatile organic compound (VOC) captured.~~

~~(b) When operating the catalytic oxidizer to achieve the limit for rule 326 IAC 8-5-5(e)(3), a capture system must be used at all times in conjunction with the oxidizer to attain an efficiency sufficient to achieve an overall control efficiency (capture and destruction) of sixty (60%) percent for the flexographic printing press #5. The overall destruction efficiency and the use of the catalytic oxidizer is required by the rule 326 IAC 8-5-5.~~

Until the initial compliance stack tests are performed, the Permittee shall maintain the catalytic oxidizer at a minimum operating temperature of 600 degrees Fahrenheit and the associated capture system within a duct pressure range established based on the manufacturer's specifications and recommendations.

After completion of the initial compliance stack test, the Permittee shall maintain the catalytic oxidizer and associated capture system at the minimum operating temperature and duct pressure range determined of the most recent compliance stack test that achieve the minimum destruction and overall control efficiencies required in Part (a) of this Condition.

Condition D.2.2 shall be amended as follows to correct some of the current requirements and to reflect Printpack's proposed changes.

Part (a) of Condition D.2.2 limits the VOC emissions to avoid the requirements of Prevention of Significant Deterioration (PSD).

Printpack, Inc. has proposed the following language:

~~Pursuant to SSM 105-11179, issued November 4, 1999, any change or modification which may increase the VOC input to 625 tons per year or more based on an overall control efficiency of 60% from the flexographic printing press # 5 must be approved by the Office of Air Management (OAM) before such change may occur.~~

Compliance with PSD limits shall be determined using the following equation:

X * (1 - (capture efficiency * Destruct efficiency)) < 125 tons of VOC per twelve (12) consecutive month period

Where X = all VOC usage (process and cleanup solvent) on Press #5

After review of the proposed language, it is determined that the following language, similar to Condition D.1.2, shall be incorporated into the permit. Printpack's proposed equation will be added to the compliance determination requirements of Condition D.2.4 and the VOC emission limit shall still be 250 tons per year because there are no rules that allow the Office of Air Quality to limit the emissions to less than the PSD level for the modification (250 tons/yr).

D.2.2 **PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]**

(a) The Permittee shall limit the VOC emissions from process EU-003 to less than 250 tons per year, based on a twelve (12) month rolling total.

(b) To achieve compliance with the limit in Part (a) of this Condition and the requirements of Condition D.2.1, the Permittee shall operate and maintain at all times process EU-003 is in operation, a catalytic oxidizer and an associated capture system:

(1) according to the requirements specified in Condition D.2.1; and

(2) at the minimum operating temperature and duct pressure range determined in the most recent compliance stack test that achieves compliance with the VOC emission limit of Part (a) of this condition and the destruction and overall control efficiency requirements of Condition D.2.2.

Condition D.2.3 consists of the requirements to have a Preventive Maintenance Plan. No changes to this condition are necessary as a result of the Printpack's proposed changes.

Condition D.2.4 lists the compliance determination requirements for Condition D.2.2. Condition D.2.2 shall be amended as follows to include the determination include the equation proposed by Printpack.

D.2.4 Volatile Organic Compounds (VOC)

To determine compliance with the VOC ~~usage~~ limit~~ations contained in~~ **of** Condition D.2.1**, the Permittee** shall**, on a monthly basis:** ~~be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer.~~

(a) determine the VOC emissions from process EU-003, utilizing the following equation:

[X * (1 - (CE EU-003 * DE EU-003))] = tons VOC/month

where:

X = VOC input to EU-003 (tons VOC/month),

CE EU-003 = capture efficiency of EU-003 capture system, as obtained from the most recent acceptable stack test
DE EU-003 = destruction efficiency of EU-003 catalytic oxidizer, as obtained from the most recent acceptable stack test

The input VOCs used to determine the monthly emissions shall be derived using formulation data supplied by the coating manufacturer and shall be based on a volume weighted average basis as described in 326 IAC 8-1-2(a)(7).

The ~~IDEM, OAM~~ **Office of Air Quality (OAQ)** reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4**;**

and

(b) determine the 12 month rolling total VOC emissions utilizing the following equation:

Tons VOC/yr (12 month rolling total) = [(tons VOC past 11 months) + (tons VOC this month)] / 12

Condition D.2.5 requires the Permittee to maintain the catalytic oxidizer at 600 degrees or the minimum operating temperature determined in the latest stack test that will achieve at least 60% overall efficiency. This requirement is already listed in Condition D.2.1. Thus, this condition shall be removed.

~~D.2.5 Minimum Temperature Requirement For Catalytic Oxidizer~~

~~When operating, the catalytic oxidizer, known as catalytic oxidizer #3, shall maintain a minimum temperature of 600 degrees Fahrenheit or the minimum operating temperature determined by the latest stack test that will achieve at least a sixty (60%) percent overall efficiency for each oxidizer.~~

Condition D.2.6 (now Condition D.2.5) lists the testing requirements. Printpack, Inc. has requested this condition be changed as follows to require testing of both catalytic oxidizers utilizing one representative press.

(a) On and after October 31, 2002, the Permittee shall perform a capture test on Press #5.

(b) Compliance stack tests shall be performed for both of the catalytic oxidizer #3, used to achieve compliance with 326 IAC 8-5-5. The initial stack tests shall be performed on or before October 31, 2002, and thereafter, every two and one half years (plus/minus 60 days) to determine the minimum operating temperature that will achieve 90% or greater destruction efficiency for catalytic oxidizer #3.

The existing stack testing requirement includes the statement “utilizing methods approved by the Commissioner”. This statement is included in the permit to provide the compliance section the ability to establish the test dates and protocols. Thus, the proposed changes do not need to be made. However, Condition D.2.6 (now Condition D.2.5) shall be amended to reflect the changes in the permit language that require the Permittee to achieve the efficiencies required in Condition D.2.1 and achieve compliance with the PSD limit of Condition D.2.2.

D.2.6~~5~~ Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11]

During the period between 12 to 30 months after the issuance of this permit or within two and one half (2½) years of the latest valid compliance demonstration, the Permittee shall perform compliance stack tests ~~for capture and destruction~~ **to establish the operating temperature of** ~~for the~~ **the EU-003** catalytic oxidizer ~~#1 and #2~~ **and the duct pressure range of the capture system that achieves compliance with the destruction and overall control efficiencies required in Condition D.2.1 and the VOC emission limit of Condition D.2.2.** ~~used to achieve compliance with 326 IAC 8-5-5 utilizing methods approved by the commissioner.~~

These stack tests shall be performed at least once every two and one half (2 ½) years after the last valid compliance demonstration **utilizing methods approved by the Commissioner** ~~to determine the minimum operating temperature that will achieve at least a sixty (60%) overall efficiency for each of these oxidizers~~. ~~In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facilities are in compliance.~~

Condition D.2.7 (now Condition D.2.6) currently requires a continuous monitoring system to measure the operating temperature of the catalytic oxidizers and a requirement to include in the PMP, the procedures for trouble shooting, maintenance, and corrective actions when there is a problem.

Printpack, Inc. has proposed the following language for Condition D.2.7 (now Condition D.2.6). Based on review of the language, Condition D.2.7 (now Condition D.2.6) shall be amended as follows. The first paragraph lists the original condition language. This language has been struck out. All language following the first paragraph is the language proposed by Printpack, Inc. Language added by the OAQ is in bold type. Any language deleted by the OAQ is struck out:

D.2.~~7~~**6** Parametric Monitoring

~~A continuous monitoring system shall be calibrated, maintained, and operated on the catalytic oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.~~

To determine compliance with the limits of Conditions D.2.1 and D.2.2, the owner or operator shall:

(a) **install,** ~~A continuous monitoring system shall be~~ calibrate~~d~~, maintain~~ed~~, and operate~~ed, ~~**according to the manufacturer's specifications:**

(1) a continuous monitoring system (CMS) on the catalytic oxidizer for measuring **the** operating temperature**, and** ~~The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during he most recent compliance stack test. The Preventive Maintenance Plan (PMP) for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above-mentioned temperature for any one reading.~~

(~~b~~**2**) ~~The oxidizer system fans moving the exhaust fumes from the printing operation to the oxidizers shall be in operation when the printing presses are operated.~~ **duct pressure meters and recorders at the duct inlet for measuring the duct pressure of the capture system;**

and

~~(c) To assure that exhaust fumes are captured at a rate equivalent or greater than the rate documented during the test program described in Condition D.2.6(a), the oxidizer system pressure controller set point shall be the same as during the baseline test program. The duct operating pressure range around that set point shall be determined during the baseline test program. Meters and recorders shall be installed and operated on or before October 1, 2002 to document compliance with this condition. Any three-hour average pressure reading more than 10% below the bound of the pressure range established during the compliance test shall be an excursion of this condition and shall necessitate implementation of a corrective action plan.~~

(~~d~~b) develop and implement the following additional inspection**, maintenance,** and preventive measures **other than those required under Condition D.2.3, for the catalytic oxidizers, capture system, temperature CMS, and duct pressure meters and recorders:**

(1) monthly inspection**, routine maintenance,** and **if necessary,** repair **and/or replacement** ~~, as necessary~~ of flexible press hoses and fan motor belts;
(2) quarterly inspection, **routine maintenance,** and **if necessary,** repair **and/or replacement**~~, as necessary,~~ of all automatic dampers (oxidizers, press supply ducts, and press exhaust ducts);

(3) monthly **inspection,**~~s~~ **routine maintenance, and if necessary, repair and/or replacement** of oxidizers and press ductwork for leakage and of oxidizer shells for cracked welds and loose flange bolts;
(4) monthly visual inspections**, routine maintenance, and if necessary, repair and replacement** of rooftop ductwork;
(5) annual flow direction (i.e. “Smoke”) tests;
(6) annual calibration of the oxidizer press controller; and
(7) **inspection, routine maintenance, and if necessary, repair and/or replacement of the temperature CMS and duct pressure meters and recorders, performed according to the manufacturer’s specifications.** ~~Implementation of an operational procedure checklist, including response procedures for deviations from the established duct operating pressure range.~~

These inspection, maintenance, and preventive measures shall be ~~performed as prescribed~~ **included** in the Preventive Maintenance Plan (PMP) **required in Condition D.2.3.** ~~At a minimum, the plan shall include:~~

Since this condition consists of determination requirements, the condition shall become part of the compliance determination section.

A new Condition D.2.7 shall be added to include the monitoring requirements associated with Condition D.2.6.

D.2.7 Monitoring Requirements

(a) To demonstrate compliance with the control requirements of Conditions D.2.1 and D.2.2, the Permittee shall record:

(1) the catalytic oxidizer operating temperatures required in Condition D.2.6(a)(1);

(2) the duct pressure of the capture system required in Condition D.2.6(a)(2); and

(3) the results of the inspections required in Condition D.2.6(b) including in the record the findings of the inspection and all maintenance actions taken.

(b) To demonstrate compliance with the VOC emission limit of Condition D.2.2, the owner or operator shall record on a monthly basis, the following from process EU-003:

(1) the input VOCs;

(2) the individual VOC emissions in tons per month;

(3) the combined total process VOC emissions in tons per month; and

(4) the 12 month rolling total VOC emissions;

as required in Condition D.2.4.

The record keeping requirements of Condition D.2.8 shall be amended as follows to reflect the language proposed by both the Office of Air Quality (OAQ) and Printpack Inc.

The first paragraph and Numbers (1) through (5) list the original condition language. This language has been struck out. All language following the first paragraph is the language proposed by Printpack, Inc. Language added by the OAQ is in bold type. Any language deleted by the OAQ is struck out:

D.2.8 Record Keeping Requirements

~~To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.2.~~

~~(1) The VOC content of the inks used for each month;~~

~~(2) The cleanup solvent usage for each month;~~

~~(3) The total VOC usage for each month;~~

~~(4) The weight of VOCs emitted for each compliance period ,and~~

~~(5) The continuous temperature records for the catalytic oxidizers and the temperatures used to demonstrate compliance during the most recent compliance stack test.~~

To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (a) through (g) below. ~~Records maintained for (a) through (g) shall be complete and sufficient to establish compliance with Conditions D.1.1 and D.1.2:~~

(a) ~~Pounds of~~ **the** VOC usage from inks, coatings, and press cleaning each day (this information may be retained in the computerized information management system of the plant);

(b) ~~Pounds of~~ the VOC usage from inks, coatings, and press cleaning each month **in tons per month** (this information may be retained in the computerized information management system of the plant);

(c) The ~~calculated weight of~~ **estimated monthly** VOC~~s~~ **emissions**~~tted~~ **from process EU-003;** ~~for each month as determined by the equation: (VOC usage) * (1 - (capture efficiency * destruction efficiency));~~

(d) The ~~calculated~~ **estimated** 12-month rolling **total** ~~sum of~~ VOC emissions ~~for~~ **after** each month;

(e) A copy of the most recent oxidizer destruction efficiency test report;

(f) A copy of the representative baseline capture efficiency test report; and

(g) **records of the** parametric monitoring **conducted** ~~records required under~~ **pursuant to the requirements of Condition** ~~Section~~ D.2.7**(a)(3)**.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

No reporting requirements were required in the original permit. Upon review of the emission calculations, it is determined that the potential VOC emissions from the press #5 is 965 tons/yr. In order to avoid PSD review, the source needed to limit the VOC emissions to less than 250 tons per year, determine the emissions, keep records of the emissions, and submit quarterly reports of the estimated emissions.

Thus, new Condition D.2.9 shall be added requiring reports of the estimated emissions.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

In addition to the new Condition D.2.9, a new reporting form shall be added.

Conclusion

The affected emission units shall be operated pursuant to the modified requirements specified in Significant Permit Modification number **105-15751-00018**.